



City University

of Mogadishu

3 Maka Al-Mukarama Road

K-4 Square, Mogadishu, Somalia

Telephone Numbers: +252-61-657-8898

Email: info@cu.edu.so

Website: www.cu.edu.so

Environmental & Social Safeguarding Policies

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Contents

- 1. Introduction3
- 2. Purpose3
- 3. Scope4
- 4. Application.....4
- 5. Safeguarding Responsibilities5
 - a. *CU is obligated to:*.....5
 - b. *CU Staff and Partners are obligated to:*.....5
 - c. *All CU Members, Staff, Partners, Contractors and other agents must not:*.....5
 - d. *Reporting:*.....6
 - e. *Accountability:*6
 - f. *Confidentiality:*.....6
- 6. Social Safeguards:.....7
 - Implementation and Monitoring:*.....7
 - Gender-Based Violence:*8
- 7. Privacy:8
- 8. Online Education Safeguarding Policy9
- 9. Safeguarding:9
 - Online Conduct and Best Practice:*..... 10
- 10. Environmental and Social Safeguard Policy (ESS).....11
 - Environmental Safeguards:*..... 11
- 11. Grievance Redress Mechanism:12
 - Grievance Forms:*..... 13

1. Introduction

City University of Mogadishu (CU) is committed to safeguarding and protecting the rights and welfare of vulnerable populations including women, children and adults-at-risk in all its activities in research, advocacy, and program interventions. In all actions concerning children, the welfare of the child is the paramount consideration with CU being committed to the principles of the Convention of the Rights of Children 1989, the Declaration of Human Rights 1984, and the African Charter on the Rights and Welfare of the Child, which promote respect for the rights of children.

CU is committed to promoting a work environment free from intimidation and abuse, and has a zero tolerance for sexual harassment (including unwelcome sexual advances; request for sexual favours or other verbal or physical conduct of a sexual nature which interferes with work, productivity or general sense of well-being of others, or which is made a condition of engagement to be a basis for decisions on the target).

This Safeguarding Policy builds on our Constitution; Code of Conduct and Professional Ethics; Research Ethics Policy; Project Implementation and Human Resources Policy.

CU does not tolerate any form of child abuse or exploitation. Children who come into contact with CU staff, consultants, research assistants, volunteers, suppliers or any other agents contracted by CU must be protected from deliberate or unintended actions that place them at risk of child abuse and exploitation, sexual exploitation, injury, discrimination, child trafficking and any other form of harm. Issues of safeguarding are rooted in imbalances of power and we endeavour to work collectively, collaboratively and consultatively to challenge the barriers to effective safeguarding.

This policy strives to ensure that, in particular, members and staff of CU are:

- ✓ Aware of the problem of exploitation and abuse;
- ✓ Understand that CU takes a zero tolerance approach to exploitation and abuse;
- ✓ that CU will respond swiftly and appropriately when issues of exploitation and abuse are reported;
- ✓ Encouraged to report all concerns about exploitation and abuse.

2. Purpose

The purpose of this policy is to protect women, children and adults-at-risk from any harm that may be caused due to their coming into contact with CU. It is also to inform members, staff, contractors and consultants, and other agents of CU of their contractual and moral responsibilities to safeguard children, young people, and adults-at-risk in all areas of CU's work. Children, in particular, who come into contact with CU staff, consultants, research assistants, volunteers, suppliers or any other agents contracted by CU must be

Protected from deliberate or unintended actions that place them at risk of child abuse and exploitation, sexual exploitation, injury, discrimination, child trafficking and any other form of harm.

This includes harm arising from:

- i. The conduct of CU staff and Partners
- ii. The design and implementation of CU programs and activities

3. Scope

This policy applies to and covers the following:

- ✓ CU Members
- ✓ CU Staff
- ✓ CU Board Members
- ✓ Consultants/Contractors
- ✓ Donors/Visitors
- ✓ Partners
- ✓ Researchers and Research Assistants
- ✓ Data collection clerks
- ✓ Attachés
- ✓ Any other person working for or on behalf of CU

This Policy should be read along with the following CU policies:

- ✓ CU Child Protection Policy
- ✓ Research Ethics Policy
- ✓ Human Resource Policy
- ✓ Code of Conduct and Professional Ethics

4. Application

CU recognizes that whilst exploitation and abuse can occur anywhere, research participants/respondents and beneficiaries of development/humanitarian organizations may be particularly vulnerable in this respect.

CU will meet its commitment to protect vulnerable individuals from abuse through awareness, prevention, reporting and responding.

Breach of this policy will result in disciplinary action being taken in accordance with the CU policies, and may lead up to and including summary dismissal for gross misconduct.

5. Safeguarding Responsibilities

CU as an organization recognizes that sexual exploitation and abuse is often grounded in gender and other inequalities, and will ensure that research, advocacy and project implementation activities are conducted in a gender-sensitive manner.

a. CU is obligated to:

- ✓ Ensure the active participation of project (implementation and research) beneficiaries in assessing, planning, implementing, monitoring and evaluating programs through the systematic use of participatory methods;
- ✓ Design and undertake all its programs and activities in a way that protects children and adults-at-risk from risk of physical or psychological harm that may arise from their coming into contact with CU. ✓ Seek assurance that Consortiums, Partners, and other bodies working directly with CU have in place robust safeguarding policies and procedures, and are acting in accordance with those policies. ✓ Implement stringent safeguarding procedures when recruiting, managing and deploying CU staff ✓ Comply with Kenya legislation in any activities involving contact with children and vulnerable adults taking place in the Kenya.

b. CU Staff and Partners are obligated to:

- ✓ Contribute to creating and maintaining an environment that prevents safeguarding violations and promotes the implementation of the Safeguarding Policy.
- ✓ Report any concerns or suspicions regarding safeguarding violations by an AAK staff member or Partner via established reporting mechanisms

c. All CU Members, Staff, Partners, Contractors and other agents must not:

- ✓ Engage in sexual activity with anyone under the age of 18;
- ✓ Exchange money, employment, goods, or services for sexual favors as when travelling on behalf of CU you are an ambassador for CU. As an organization we believe that this is an abuse of power contrary to CU's policies and values;
- ✓ Sexually abuse or exploit children or adults-at-risk;
- ✓ Engage in any form of sexual relationship with beneficiaries of assistance, since they are based on inherently unequal power dynamics;
- ✓ Engage in any commercially exploitative activities with children or adults-at-risk including child labor or trafficking;
- ✓ Physically assault a child or vulnerable adult;
- ✓ Emotionally or psychologically abuse a child or vulnerable adult;
- ✓ Put a child or vulnerable adult at risk as a result of CU's activities, either through individual action, inaction or program design and implementation. This includes the way in which we gather and communicate information about individuals in our programs.

The above actions are not exhaustive and further Reference should be made to the

Research Ethics Policy, the Project Implementation and Child Protection Manual, the Human Resources Policy, and the

Board of Directors Policies and Operations Manual for further standards of expected behavior at all levels.

d. Reporting:

CU staff members who have a complaint or concern relating to safeguarding must report it immediately to the Human Resources and Administration Officer and a designated Membership Committee for further investigation and necessary action. If the staff member does not feel comfortable reporting to the HR and Admin Officer (for example if that person is implicated in the concern) they may report to any other appropriate CU Program or Administrative Staff Member, or the Executive Officer.

Staff are also required to raise any issues from their interaction with child sponsors that cause them concern. These concerns should be raised using the procedures outlined above.

If a Partner or external contractor themselves has a safeguarding complaint or concern against CU, these should be raised through CU's emails: support@cu.edu.so or support@cu.edu.so.

CU will also accept complaints from external sources such as members of the public, partners and official bodies. These can be made through CU's external Complaints email as above.

All complaints received will be investigated by CU and resolved within the shortest turn-around time possible after reporting (wherever possible). Cases which cannot be resolved internally e.g. criminal cases will be reported to the Police and resolved externally.

It is mandatory for all staff to report any incidents or concerns relating to this policy. CU will ensure that staff are clear on what steps to take where concerns arise regarding the safety or integrity of vulnerable individuals.

e. Accountability:

Accountability for safeguarding sits with the Board of Directors. Day-to-day oversight is delegated to the Executive Officer. The Human Resources and Administration Officer is the designated Safeguarding Officer for CU. The Board will appoint one of their membership to act as Board Safeguarding Lead, with responsibility on behalf of the Board for oversight of safeguarding, and can constitute an ad hoc Membership Safeguarding Committee as and when the need arises.

f. Confidentiality:

It is essential that confidentiality is maintained at all stages of the process when dealing with safeguarding concerns. Information relating to the concern and

subsequent case management should be shared on a need to know basis only, and should be kept secure at all times.

Breaches of confidentiality undermine confidence and trust in CU's safeguarding and complaints management processes and in the organization itself. Maintaining confidentiality around people's personal data and information is particularly important when managing issues relating to sexual harassment, exploitation and abuse.

From the point of disclosure to the final outcome of any investigation, every effort will be made to maintain and promote confidentiality in order to protect the safety and privacy of everyone involved.

Information must be shared on a need-to-know basis – that is, only those who need to be informed so they can support an investigation or because they hold overall accountability will be given information, and they will receive only as much information as they need in order to be effective.

If information is shared confidentially which relates to a child or suggests that someone's life is in danger, then confidentiality may need to be breached in order to ensure that everyone is safe. This will be managed on a case by case basis, and the safety and wellbeing of the child or at-risk adult in question is always paramount. As noted above, only those who need to know will be informed so they can take effective action.

6. Social Safeguards:

1. **Social Impact Assessment:** City University will conduct social impact assessments for all new projects, programs, and activities to identify potential social risks and develop mitigation measures.
2. **Labour Standards:** City University will adhere to labour standards that promote fair and safe working conditions, non-discrimination, and equal opportunity.
3. **Community Engagement:** City University will engage with local communities and stakeholders to promote their participation in decision-making processes that affect their lives and livelihoods.
4. **Human Rights:** City University will respect and promote human rights, including the rights of indigenous peoples, women, children, and vulnerable groups.
5. **Cultural Heritage:** City University will respect and protect cultural heritage sites, artifacts, and practices.

Implementation and Monitoring:

City University will implement this Environmental and Social Safeguard Policy through the following measures:

1. Integrating the policy into all university operations and activities.
2. Providing training and awareness-raising activities for staff, faculty, and students.

3. Monitoring and evaluating policy implementation through regular reporting and review.
4. Regularly update the policy to ensure it remains relevant and practical.

Gender-Based Violence:

City University is committed to preventing and addressing gender-based violence and promoting a safe and respectful learning and working environment. Gender-based violence is any act or threat of physical, sexual, or psychological harm or suffering due to gender-based power imbalances, including intimidation. This includes but is not limited to sexual harassment, sexual assault, domestic violence, and stalking.

City University will take the following measures to prevent and address gender-based violence:

1. Develop and implement a comprehensive policy on gender-based violence that includes prevention, response, and support measures.
2. Provide training and awareness-raising activities for staff, faculty, and students to prevent and address gender-based violence.
3. Establish confidential reporting mechanisms for victims of gender-based violence, including a reporting hotline and email address.
4. Provide support services for victims of gender-based violence, including counselling, medical care, and legal support.
5. Investigate all reports of gender-based violence and take appropriate disciplinary action against perpetrators.

7. Privacy:

1. The contents of all communications between the education professional, schools (schools and any other educational establishment), parents and pupils should go via City University or through the City University online platform in order to protect the anonymity and/or personal details of the pupil and the education professional.
2. The education professional will not be aware of the email address of the pupil/s or parent/responsible adult and will not be able to communicate with them directly other than via the team at City University or, if possible, through City University's online platform.
3. All personal details about the pupils and parents, including personal email address and phone number, will remain private and confidential and will not be available to the education professional.
4. All data held by City University of Mogadishu is in accordance with the National Data Privacy Policies of the Somali National Bureau of Statistics.
5. City University may review any content shared between education professionals and pupils, and will allow access to third parties where any allegation or child protection concern is raised.

6. All staff involved in online education will be expected to familiarize themselves with basic safeguarding principles and guidance relating to online safety. Keeping Children Safe in Education & Working Together To Safeguard Children.

8. Online Education Safeguarding Policy

This policy is designed to give policy guidance specifically for online education. This policy applies to all staff, including permanent and temporary employees of City University, as well as educational professionals who receive assignments through City University and anyone working on behalf of City University as an online teacher or tutor, or in any other capacity related to online education.

Alongside this policy, all education professionals undertaking work in online education on behalf of City University must also agree to and adhere to City University's Code of Conduct and Social Networking, Phones and other Mobile Devices Policy.

The aim of this policy is to protect all children, young people and vulnerable adults during any form of online education.

9. Safeguarding:

- a. All safeguarding-related policy and procedure guidance provided by City University during registration should be fully read and understood before engaging in any work in online education.
- b. Staff who work with children, young people and vulnerable adults must look out for signs of risk online too. Any safeguarding concerns raised to, or observed by, an online Teacher must be reported immediately to the Designated Safeguarding Lead at the school or to the Designated Safeguarding Lead at City University by emailing support@cu.edu.so and addressing the email to the Designated Safeguarding Lead.
- c. All peer-on-peer abuse, whether suspected or observed, should be immediately reported to the Designated Safeguarding Lead at the school or to the Designated Safeguarding Lead at City University by emailing support@cu.edu.so and addressing the email to the Designated Safeguarding Lead.
- d. Full safeguarding and vetting procedures must be carried out and full compliance criteria must be met before a candidate is able to conduct online tutoring/teaching. Anyone found to be unsuitable for a role with City University will not be given access to any job opportunities in online education either.
- e. Anyone alleged to be, or found to be, unsuitable whilst cleared for work in either an online or non-online educational capacity, will have their access to any job opportunities through City University immediately revoked.
- f. If you become aware of children/Young People/Vulnerable Adults being represented or referred to in a way or that gives cause for concern, in an offline or an online setting, contact the Designated Safeguarding Lead at the school or to the Designated Safeguarding Lead at City University by emailing

support@cu.edu.so and addressing the email to the Designated Safeguarding Lead.

Online Conduct and Best Practice:

1. You may only deliver online education using the delivery systems approved and provisioned to you by City University. These systems must be adequately secure from both a cyber security perspective and safeguarding perspective. They must:
 - a. Employ password encryption at log-on stage.
 - b. Keep a log of all individual and group chat conversations.
 - c. Keep a timestamped log of log-on and log-off times for each user.
 - d. Provide secure storage for any less-related content and for recordings made or used for purposes of the lesson. These should only be downloadable from the system by an administrator.

You must not rely on commercial tools such as Skype, Google Hangouts, Zoom (except for university managed zoom for education licenced to the City University of Mogadishu), Whereby or other video conferencing tools to deliver any teaching or tutoring.

2. To access any platform through which you may deliver education, choose a password that is at least 8 characters long, contains lower case letters, upper case letters and numbers and does not contain easy to guess words such as your name, date of birth or phone number.
3. Before delivering your first online education session using a new system, or using a new username to access a system you may have used at another school, visit the privacy settings section and acquaint yourself with the possible settings. If possible, set the system to log you out automatically if the system has been idle for longer than 15 minutes. You may choose a shorter time than that but not longer.
4. Make yourself familiar with essential controls during delivering the online education sessions. These include but are not limited to controlling who can share their screen and muting/unmuting controls.
5. At the end of every online education session, make sure you log off correctly.
6. While teaching online live (live-streaming), it is essential you consider your location and camera settings carefully to maintain a professional and responsible disposition at all times.
 - a. Choose a neutral location that is appropriate and safe. Ensure you choose an appropriate venue (e.g. a living room, a study or a kitchen).
 - b. Reduce the possibility of the lesson being interrupted by a household member or pet.
 - c. Consider carefully what is in view of the camera i.e. check that the background is professional and does not contain images or information that should not be shared or that could be deemed inappropriate. It may be helpful to ask a 'critical friend' to check what is in view of the camera.

- d. If the system enables you to change or blur your background display, this could be something you use and encourage your learners to use.
 - e. Be mindful that not all learners will want to switch their camera on – you should make turning the camera on optional.
 - f. Encourage learners to work from a suitable shared home location where they feel comfortable, preferably accompanied by their parent/carer.
 - g. The use of a headset with microphone (like those available with many mobile phones) is recommended for audio clarity.
 - h. Your camera should be on only while you are actively teaching. Do not leave it on at any other point. Cover the camera lens physically when you are not using it to ensure you do not leave it on accidentally.
7. Only record your lesson if you have received clear permission to do so from the university's senior management team. As a live-stream recording constitutes personal data, you must comply with the school's data protection policies including:
 - a. Obtaining permission from parents or carers or learners* to record a live-streamed lesson.
 - b. Ensuring you treat live-stream recording just as you would any other personal data and keep up-to-date with all the data protection resources and guidance.
 8. Do not record online education sessions through any means other than those built into the system that has been approved and provisioned to you by the school or by City University.
 9. Do not share on screen any photos of yourself.
 10. Do not prompt or allow pupils to share photos on screen.
 11. Do not disclose any personal information while teaching online.
 12. Never accept Children/ Young People/ Vulnerable Adults with whom your involvement is in a professional capacity as 'Friends' or similar on their personal media sites.
 13. Do not send or receive any digital images of Children/Young People/Vulnerable Adults on mobile phones or online.

10. Environmental and Social Safeguard Policy (ESS)

This policy aims to ensure that City University of Mogadishu's (CU) operations and activities do not negatively impact the environment and local communities and to promote sustainable development.

Environmental Safeguards:

1. Environmental Impact Assessment: City University of Mogadishu will conduct environmental impact assessments for all new projects, programs, and activities to identify potential environmental risks and develop mitigation measures.

2. **Waste Management:** City University will implement a comprehensive waste management system that includes waste reduction, segregation, recycling, and safe disposal of hazardous waste.
3. **Energy Conservation:** City University will promote energy conservation measures such as using energy-efficient equipment, minimizing energy consumption, and utilizing renewable energy sources where feasible.
4. **Water Conservation:** City University will implement water conservation measures, such as using water-efficient fixtures, harvesting rainwater, and treating wastewater before discharge.
5. **Biodiversity Conservation:** City University will undertake measures to conserve biodiversity, such as protecting and restoring natural habitats and promoting sustainable land use practices.

11. Grievance Redress Mechanism:

City University recognizes that stakeholders may have concerns or grievances about the university's operations and activities. City University is committed to addressing these concerns and grievances fairly, transparently, and timely.

City University will take the following measures to establish a grievance redress mechanism:

1. Develop and implement a grievance redress mechanism that is accessible, transparent, and accountable.
2. Provide information about the grievance redress mechanism to all stakeholders, including staff, faculty, students, and local communities.
3. Establish a dedicated office or committee to receive and review grievances and complaints.
4. Ensure that grievances are addressed in a timely and efficient manner.
5. Provide feedback to stakeholders on the outcome of their grievances.
6. Establish a system for monitoring and evaluating the effectiveness of the grievance redress mechanism and making necessary improvements.

This Environmental and Social Safeguard Policy aims to promote a safe, inclusive, and respectful learning and working environment for all stakeholders of City University. By implementing measures to prevent and address gender-based violence and establishing a grievance redress mechanism, City University can demonstrate its commitment to social responsibility and ensure that stakeholders' concerns and grievances are handled fairly and transparently.

Grievance Forms:

Section 1: Personal Information	
Name:	
Address:	
Phone Number:	
Email:	
Section 2: Grievance Information	
Date of Incident:	
Location of Incident:	
Description of Incident:	
Section 3: Impacts	
What are the impacts of the incident on you?	
How has the incident affected your family or community?	
Do you have any supporting documents or evidence to attach to this grievance form? (e.g., medical reports, photographs, witness statements, etc.)	
Section 4: Resolution Request	
What resolution do you seek?	
What action do you suggest should be taken to address the issue?	
Section 5: Consent to Share Information	
Do you consent to share this information with the relevant City University Officials and third-party Investigator as necessary to address this grievance?	
Section 6: Gender-Based Violence-Specific Questions	
If this grievance is related to gender-based violence, please answer the following questions:	
Have you sought medical attention?	
Have you reported the incident to the police?	
Have you received counselling or support services?	
Do you want to pursue disciplinary action against the perpetrator(s)?	
Section 7: Signature:	
By Signing below, I confirm that the information provided in this grievance form is true and accurate to the best of my knowledge.	
Signature:	
Date:	

Please submit this completed grievance form to the designated City University office or committee responsible for grievance redress.

support@cu.edu.so

